

1 A If I remember, I also had some information I think
2 from Harris. I had some other information. I received
3 catalogs, price lists, constantly from other companies.

4 Q Had you purchased equipment from Harris before?

5 A Yes.

6 Q The -- you refer to as having had discussions with
7 Hall Electronics in Charlottesville?

8 A Yes.

9 Q Had you purchased equipment from Hall previously?

10 A Yes.

11 Q Do you recall what you purchased from them?

12 A Not really, no.

13 Q Okay. In the next paragraph, on your written
14 testimony, you refer to a pair of paralector antennas?

15 A Yes.

16 Q In fact, your -- the budget that you submitted, or
17 not submitted, but the budget that you prepared, a written
18 estimate of costs that you prepared reflected only one of the
19 paralectors. Is that correct?

20 A Yes.

21 Q Mr. Bryan, you indicate in your testimony that --
22 that the transmitter antenna cost would be based on the
23 configuration equipment which would be difficult to determine
24 until you were ready to construct the station. What was --
25 why was that -- what was difficult about determining what

1 configuration of antenna transmitter you would use in advance
2 of building the station?

3 A Well, first of all, I'm not an engineer and I would
4 use their expertise when I actually began the construction.

5 JUDGE FRYSIK: Well, was this something you were
6 told, or --

7 MR. BRYAN: Yes, yes. As I would talk to other
8 experts, you know, one would suggest certain power transmitter
9 to be -- different powers to be used so different antenna I
10 understood could be used. I wasn't sure myself.

11 JUDGE FRYSIK: And these experts were who?

12 MR. BRYAN: Engineers.

13 BY MR. BRADY:

14 Q Can you recall who -- are you speaking of someone
15 that Hall Electronics or someone else?

16 A Yes. The gentleman I was talking to quite a bit at
17 Hall was an engineer that did consulting in the building for
18 other stations.

19 Q Do you recall his name?

20 A Bill Davis, I believe it was.

21 Q So it was your understanding that -- that it was
22 difficult to determine what configuration of antenna and
23 transmitter, transmission line and so forth that you would use
24 in the station prior to actually constructing it?

25 A Yes. Well, I was told that when we got to the

1 finalized construction site that it would be better to -- and
2 get the best coverage possible.

3 Q Now, who would --

4 A It was hard to predetermine what you were going to
5 do.

6 Q Did -- did he indicate to you how that would be
7 accomplished with a set of a -- transmitter to do that?

8 A I don't know about that part.

9 Q Did -- did Hall indicate that -- that they -- could
10 they -- would they provide that service or would someone else
11 do that?

12 A Didn't say. It would be up to me to decide.

13 Q So it was your understanding they were talking about
14 some type of field testing to determine which would be the
15 best -- provide the best coverage?

16 A I assume so.

17 Q You indicate that you obtained a quote for three to
18 six -- for a three to six bay antenna.

19 A Yes.

20 Q Why -- why did you do that, Mr. Bryan?

21 A Again, I'm not positive which would be used. With
22 consultation with my attorney we definitely agreed to get the,
23 you know, the largest bay antenna to cover an expense that
24 might not be right.

25 Q I wanted to show you a document.

1 MR. BRADY: Your Honor, I want to show the witness a
2 document and have it marked. I believe I'm up to nine, is
3 that correct?

4 JUDGE FRYSIK: Yes.

5 BY MR. BRADY:

6 Q Do you recognize the document that I -- that I've
7 placed in front of you that's been marked as SBH Exhibit 9?

8 A Yes.

9 Q Was this prepared by your engineer, Mr. Lysiak?

10 A Yes.

11 Q Did I pronounce his name correctly?

12 A I believe it's Lysiak.

13 Q Lysiak? Okay. Is it not true that Mr. Lysiak
14 indicates in this statement that the maximum number of antenna
15 that could be -- or bays that could be configured with your
16 proposal, were four, not six?

17 A I believe that's correct, yes.

18 Q Okay.

19 JUDGE FRYSIK: Where do you see the word maximum
20 number?

21 MR. BRADY: I'm looking for it, Your Honor. Okay,
22 Your Honor, the word maximum doesn't appear. It does indicate
23 on the first page.

24 BY MR. BRADY:

25 Q Mr. Bryan, just to clarify, it does indicate on the

1 first page, does it not, that the proposal in your
2 application would permit and allow an antenna up to four bays,
3 to be mounted. It doesn't actually use the word maximum but
4 it indicates up to four bays could be utilized.

5 A What I -- not sure if it -- the proposal or not.
6 I'm not sure of the answer to your question.

7 Q Okay. The -- the -- did you -- Mr. Lysiak indicates
8 that the proposal, reflected in your application, would permit
9 up to four bays to be mounted on the tower. Is that correct?

10 A I believe that's correct, yes.

11 Q Okay. And so my question is, given the fact that --
12 that only up to -- only four bays were the most number of bays
13 which could be mounted on the proposal is even advanced it,
14 why were you looking at a three -- or six bay -- why were you
15 looking for a six bay antenna?

16 A It was my understanding that for the initial
17 application we do not have to propose the exact equipment that
18 would be used. So, the answer will cover any question of
19 amount of money to be used for whatever places we decided to
20 use it at. It was not meant to determine the amount of bays
21 at that point in time.

22 Q Okay. Did you have any discussions with Mr. Lysiak
23 regarding your technical proposal, I mean, in terms of what
24 the configurations, in terms of the antenna and the
25 transmitter, power transmitter?

1 A Mr. Lysiak's proposal was prepared by --
2 Engineering.

3 Q And that would have been, what -- that was in
4 December of '91

5 A Ninety-one.

6 Q Yes. And that was the same time you were developing
7 your costs -- Is that correct?

8 A Right. Right.

9 Q And, did you have any discussions with him regarding
10 the --

11 A Only to my attorney.

12 Q Okay. So you didn't have any discussions with Mr.
13 Lysiak regarding any recommendations regarding transmitter
14 configuration.

15 A Not at that time, no.

16 Q What size transmitter you would need.

17 A No, no.

18 Q Just for the record, Mr. Bryan, I want to show you a
19 copy of your -- a page of your application. It's section 5B.
20 This is the part of the engineering section of your
21 application. Section 5B, page 5 of that section, and that's a
22 page on which the certification of Mr. Lysiak appears. Is
23 that correct?

24 A Yes.

25 Q And what date did he execute that according to this?

1 A December 23rd, 1991.

2 Q 1991. Mr. -- Mr. Bryan, the -- you indicate at the
3 top of -- in your testimony, it's the top of page two, that
4 you did not request any written estimates in view of the fact
5 that those were generally only valid for thirty days. Is that
6 correct?

7 A That's correct.

8 Q Did the -- were you under the impression that the
9 oral information obtained orally from Broadcast Supply West
10 was of greater -- would be of greater duration than thirty
11 days. The validity -- the validity of that would be greater
12 than thirty days?

13 A As I developed -- in the past, usually they would
14 lock in a price for a certain time, you know, based on how
15 long you would probably take. You know, I was -- they would
16 lock it in for that amount of time.

17 Q Would the time at which you would have obtained --
18 if you had obtained a written estimate, would you have
19 obtained them within thirty days of the filing of your
20 application?

21 A Yes.

22 Q So they would have been valid as of the day of the
23 filing of your application, would they not?

24 A Yes.

25 Q Mr. Bryan, the next paragraph of your testimony on

1 | page 2, you referred to the fact that you have a five
2 | kilowatt, is it Kubota?

3 | A Kubota, yes.

4 | Q Kubota generator? Is that an emergency power
5 | generator?

6 | A Yes, it is.

7 | Q You indicate you have that on hand --

8 | A Yes.

9 | Q As extra equipment at WSMG.

10 | A Right.

11 | Q Okay. Is it not true that that generator is
12 | currently being used as an emergency power generator for WSMG
13 | studios?

14 | A No.

15 | Q It is not?

16 | A No.

17 | Q What -- when was it last used?

18 | A To be honest, I've never used it as emergency power.
19 | We've never really haven't had a problem. And I've had the
20 | generator for quite a while in case I needed it. I bought it
21 | after we had a blizzard.

22 | Q When did you have the blizzard?

23 | A It was '88 was the blizzard.

24 | Q Okay. And -- and it's located at -- it's located at
25 | the studio, isn't it? WSMG studio?

1 A Not necessarily. I've had it at -- I've had it at
2 my house part of the time. I've used it -- I've loaned it out
3 to people more than I've used it for myself.

4 Q I see. Your Honor, I'd like to have this document
5 marked as SBH Exhibit 10. Mr. Bryan, do you recognize what
6 has been marked as SBH Exhibit 10?

7 A I do.

8 Q Is this a -- a financing statement and then
9 accompanying two page collateral description relating to loan
10 from Green County Bank to Burley Broadcasters Company?

11 A Yes.

12 Q And this is -- the equipment listed on the
13 collateral is as on the collateral description is pledged to
14 Green County Bank by Burley Broadcasters to secure payment of
15 the loan. Is that correct?

16 A That's correct.

17 Q And is not the Kubota generator that you just
18 referred to listed on page three of this exhibit?

19 A It is.

20 Q So it is pledged as security by Burley Broadcasters,
21 Inc. to Green County Bank. Is that correct?

22 A Yes.

23 Q Continuing on in your testimony, Mr. Bryan, you have
24 a -- you refer to a technical person at Hall Electronics.

25 A Yes.

1 Q You know who that person is you are referring to by
2 name? Or can you give us a name.

3 A I think I mentioned earlier Bill Davis, I believe
4 his name was.

5 Q Okay. And, does Hall Electronics sell towers.

6 A I think they do, yes. Now they do.

7 Q Do you know whether they did at the -- in 199`1?

8 A I'm not sure about that.

9 Q Okay. Do they sell any particular type of tower or
10 certain type?

11 A I don't know about that.

12 Q Okay. And you obtained, you say, a ballpark figure
13 from this person?

14 A Yes.

15 Q That was, I guess, an estimate, as opposed to a
16 specific price for a specific tower?

17 A Yes.

18 Q Not a specific make of tower.

19 A No.

20 Q Okay.

21 JUDGE FRYSIK: It was a range?

22 MR. BRYAN: It was a range. My question to him was,
23 what would a tower cost, based on an average. He had
24 mentioned some towers and equipment he had installed and just
25 gave me a price, based on what it cost him.

1 JUDGE FRYSIAK: So the figure was in the middle of
2 the range, is that it?

3 MR. BRYAN: Yes, probably middle to low, yes. It
4 was a good price.

5 BY MR. BRADY:

6 Q Was there any reason why you didn't obtain a written
7 quote from a tower company?

8 A Not really. Once I had the price, I figured that
9 was sufficient. But, I had had a lot of conversations with
10 Mr. Davis and he had helped me quite a bit.

11 Q Okay. Was he helping you in putting together your
12 cost estimates? Was he the person you were talking to?

13 A No. Not really. When I had a question about
14 equipment or what one would cost, you know, he sold the
15 equipment also.

16 Q Right.

17 A He was an engineer who sold equipment so I felt like
18 he could help me get good prices.

19 Q Did you provide him with any kind of specifications
20 regarding the tower you were going -- that you were asking him
21 to give you a price on?

22 A Well, we discussed what bay antenna so I --

23 Q I'm not -- I didn't understand.

24 A I -- I said we discussed -- we were discussing, you
25 know from a three to six bay antenna. His information was

1 based on that.

2 Q Oh, okay. I see what you're saying. Did you
3 discuss with him whether or not the tower would -- would be
4 required to support any antennas other than the FM antenna?

5 A I'm not sure about that.

6 Q In the same paragraph, your testimony on page two,
7 you refer to how you arrived at the eight hundred dollar
8 figure you put in your proposal and indicated that you had
9 access to a local person who builds the type of studio you
10 studio furniture you needed. Did you obtain any kind of quote
11 from that person?

12 A Just orally.

13 Q Okay. So you did talk to them, though?

14 A Yes.

15 Q And then how did you arrive at the eight hundred
16 dollar figure? Was that -- was that the quote they gave you?

17 A Well, the -- yes. The -- I gave them a look at what
18 I had in my other studio and was basing it on what he saw
19 there. I told him I wanted something similar, you know,
20 partly, a tad different.

21 Q Okay. And, continuing on in the same paragraph, you
22 indicate that you estimated five hundred dollars for office
23 furniture because you had unused tables, chairs, desks and
24 typewriters on hand at WSMG?

25 A Right.

1 Q Are those -- are not those tables and chairs
2 property of WSMG and Burley Broadcasters?

3 A No. I brought chairs, tables and things along the
4 way, knowing that I would probably need them at some point in
5 time.

6 Q Well, let me ask this question, referring to SBH
7 Exhibit 10, page 2, this collateral description lists on --
8 near the top -- or middle of that page, a number of -- of
9 desks and typewriters and chairs and so forth. Are any of
10 those chairs and desks and typewriters referred to in this
11 Exhibit 10, the same as the ones you are referring to in your
12 testimony?

13 A No.

14 Q Do you have -- are these -- are these in storage?

15 A No. Some are in the building but there's a lot of
16 extra equipment in my building that I've added since this
17 point in time.

18 Q Okay. Do you have an understanding regarding -- so
19 you're saying that some of this equipment is -- that you're
20 referring to in your testimony, is in storage and some is in
21 use in your studio?

22 A Yeah. There's some furniture that's not being used
23 at this point in time. There's some equipment that's sitting
24 in the studio we have I have more than one floor. I also have
25 a storage building and there's equipment there, sealed

1 equipment and furniture that is not being used, it's extra.
2 Like I said, I had bought -- this happened in 1989, I believe
3 it was, I bought some various things at that point in time.
4 If it was a good deal --

5 Q The collateral -- you're -- you're saying the
6 collateral was -- prepared in '89?

7 A Yes, it was.

8 Q That -- that -- I believe you're right. In fact,
9 there's a date on -- indicating that -- date is March 1, 1989.
10 Is that correct?

11 A That sounds right.

12 Q And just for reference, I believe there's a -- well,
13 that's the only date I see. But, this was -- it appears that
14 this has a date stamp at the Secretary of State's office, some
15 time in March of '89. Is that correct?

16 A That sounds right.

17 Q Okay. Now, is -- do -- do -- you have an
18 understanding regarding whether or not the security agreement
19 with Green County Bank covers any equipment that would be
20 acquired by the station after the date of this financing
21 statement was filed?

22 A I think it was discussed. I think really would be
23 determined on how it would be used.

24 JUDGE FRYSIK: No, he asked you whether there was
25 any document --

1 MR. BRYAN: Any document?

2 JUDGE FRYSIAK: That indicates --

3 MR. BRYAN: I'm not sure about that.

4 BY MR. BRADY:

5 Q Well, do you understand -- do you have an
6 understanding as to what the agreement is -- whether it's --
7 in terms of whether or not this -- the security agreement --

8 A Are you saying that if I purchased it or if Burley
9 Broadcasters purchased it? There's a big difference. I own
10 Burley Broadcasters, but all things I purchase separately. So
11 anything I purchase separately the bank wouldn't have anything
12 to do with. If that's your question.

13 Q Well, it indicates, on page two of Exhibit 10, does
14 it not, that the -- that it -- that this security arrangement
15 relates to all the debtor's equipment for any -- use in the
16 operation of the broadcasting business, including, but not
17 limited to the ones listed on the exhibit. Is that correct?

18 A I think if it had been used, yes.

19 Q Okay. And the financing statement on the first page
20 of Exhibit 10 indicates all the debtor's equipment, furniture
21 and fixtures used in the operation of broadcasting business
22 now on hand or hereafter acquired. Is that correct?

23 A Yes.

24 Q So, you're saying the -- are you saying then that --
25 that the determining factor would be whether it was paid for

1 with a check drawn on Burley Broadcasters' account or paid
2 with a check drawn on your personal account as to whether --
3 is that your understanding of what makes the difference of
4 what's covered by this security agreement and what is not?

5 A I'm not sure if that's the correct answer. That's
6 one possible way to determine it.

7 Q What -- what is your understanding that -- if you
8 don't agree with that, I mean, that's fine?

9 A I know, but I haven't, you know -- I own Burley
10 Broadcasters so, you know, either way would be acceptable, I
11 guess.

12 Q Okay. Well, if -- if there was a point -- the point
13 at which the bank was foreclosing, let's say, what would the
14 bank -- how would you determine what the bank had a right to
15 sell in a foreclosure sale and what would not be property if
16 it was covered by the security arrangement that the bank would
17 not be entitled to foreclose on?

18 A Well, I guaranteed the loan so the bank probably
19 could take everything I own. I mean, I guaranteed the loan
20 myself, you know, along with the corporation. So --

21 Q As a practical matter, you're saying it doesn't make
22 any difference.

23 A It's mine. Either way, if they foreclose, then it's
24 all mine, anyway. Or wouldn't be mine any longer.

25 Q In the next paragraph, you refer to the fact that

1 your operating budget, or the fact that you purchased the
2 transmitter site. Is that correct?

3 A Yes.

4 Q Okay.

5 MR. BRADY: Your Honor, I have a document I'd like
6 to have marked as Exhibit Number 11. It's a one page
7 document.

8 (Whereupon, the document referred to
9 was marked for identification as SBH
10 Exhibit Number 11.)

11 BY MR. BRADY:

12 Q Mr. Bryan, do you recognize what's been marked for
13 identification as SBH Exhibit 11?

14 A Yes.

15 Q Okay. And is that -- it has a title on it, does it
16 not, that says, "Land Option Agreement Letter"?

17 A Yes.

18 Q And, this is an agreement with Mr. Charles A. Love.
19 Is that correct?

20 A Yes.

21 Q And, it's true, isn't it, that Mr. Love is
22 identified in your application as the owner of your
23 transmitter site?

24 A Yes.

25 Q Okay. And, under the terms of this letter

1 agreement, he is giving you -- granting you an option to
2 purchase the property that consists of 3.64 acres?

3 A Yes.

4 Q And the purchase price is \$7,000. Is that correct?

5 A Correct.

6 Q So the -- the option that you obtained at the time,
7 but prior to the filing of your application -- I don't see the
8 date on here but it was notarized. This was executed prior to
9 the filing of your application. Is that correct?

10 A Yes.

11 Q Okay. The -- at the time you filed your application
12 then you had an option to acquire your transmitter site by
13 purchase. Is that correct?

14 A That's correct.

15 Q It was not a lease arrangement.

16 A No.

17 Q And there's nothing indicated in the option
18 agreement regarding making payments over a period of time. Is
19 that correct?

20 A Correct.

21 Q The last paragraph on page two, you referred to a
22 financial statement that was given to the bank.

23 A Yes.

24 MR. BRADY: I have, Your Honor, I have a document
25 entitled, personal financial statement and I would like to

1 have it marked as Exhibit 12.

2 JUDGE FRYSIAK: It may be marked.

3 (Whereupon, the document referred to
4 was marked for identification as
5 Exhibit 12.)

6 BY MR. BRADY:

7 Q Mr. Bryan, do you recognize the document that's been
8 marked as SBH Exhibit 12?

9 A Yes.

10 Q Okay. Can you tell me, is this the -- is this a
11 personal financial statement that you prepared?

12 A Yes, it is.

13 Q And, it's your signature at the bottom of the second
14 page?

15 A Yes.

16 Q And the date on this is 5/16/1991. Is that correct?

17 A Yes.

18 Q That five being May -- May, 16, 1991.

19 A Correct.

20 Q Is this the financial statement that you're
21 referring to that was on file at the bank?

22 A Yes.

23 Q Okay. At the time the bank reviewed your loan
24 request, did you have any other financial statement on file at
25 the bank? Any more recent one than this Exhibit 12?

1 A Not that I recall.

2 Q Okay. The -- you also had -- there was also a
3 balance sheet on file for Curley Broadcasters, Inc. Is that
4 correct?

5 A Yes.

6 Q And did the bank review that in -- in the process of
7 reviewing your loan request?

8 A I'm not sure about that?

9 Q Okay.

10 A They had it.

11 Q Okay.

12 MR. BRADY: Your Honor, I would like to have this
13 document marked as Exhibit 13.

14 JUDGE FRYSIAK: It may be marked.

15 (Whereupon, the document referred to
16 was marked for identification as
17 Exhibit 13.)

18 BY MR. BRADY:

19 Q Mr. Bryan, is this the statement of assets and
20 liabilities that was on file with the Green County Bank for
21 Burley Broadcasters, Inc.?

22 A Yes.

23 Q Okay. And the date on that is September 30, 1991.

24 A Yes.

25 Q Did you prepare this?

1 A No.

2 Q Do you know whether that is accurate as to the time
3 that it was -- was it current as of that date is what I'm
4 saying? Was the information correct as of that date?

5 A As far as I know, yes.

6 Q The -- you also indicate that you prepared a
7 proforma financial statement?

8 A Yes.

9 Q The -- you did not produce such a document in
10 discovery in this case, did you?

11 A No.

12 Q Okay. And, is that because it was not in your
13 possession?

14 A Correct.

15 Q Okay. And the bank doesn't have a copy of that
16 either. Is that correct?

17 A Correct. No.

18 Q But that was -- you indicate that was given to the
19 bank?

20 A No.

21 Q Okay.

22 A I had that when I went -- when I went to the bank I
23 had it. They possibly reviewed it but they did not keep it.

24 Q I see. And you don't know what's happened to that
25 since that time?

1 A No.

2 Q Okay. Do you recall what that -- was that a -- a
3 projection of -- of anticipated revenues and expenses for the
4 FM radio station?

5 A Yes. Basically revenues more than cost estimates.

6 Q I see. I see. Okay. And, with the exception of
7 that, the proforma that you mentioned and the Exhibit 13, the
8 Burley statement of assets and liabilities and the personal
9 financial statement, SBH Exhibit 12 that you prepared
10 yourself, you did not prepare any other financial statements
11 or balance sheets relating to the FM radio station or to your
12 own personal finances prior to the time you filed the
13 application. Is that correct?

14 A The only information they had on hand, so I didn't
15 really give them anything else, no.

16 Q And you didn't prepare anything else other than the
17 proforma which you didn't give to the bank during that time.
18 Is that correct? I'm speaking in terms of a balance sheet or
19 financial statement.

20 A No. It's possible that they asked me questions --
21 from my financial statement, but I'm not positive about that.

22 Q And I believe you indicated that, with respect to
23 the personal financial statement such as SBH Exhibit 12 that
24 you provide these to the bank annually.

25 A Yes.

1 Q Okay. I'd like to refer -- refer you to the
2 financial statement, SBH Exhibit 12. I have a few questions I
3 wanted to ask you regarding it. Did you -- were there any
4 attachments to this document at the time you provided it to
5 the bank?

6 A No.

7 Q It's a two page document that we have.

8 A That's correct.

9 Q Okay.

10 A I provided the same thing to various banks as I did
11 with Green County.

12 Q In other words, you provided -- would you provide
13 the same --

14 A Exactly the same -- all the banks have the same
15 thing.

16 Q Okay. Okay. And, the -- looking at item 29 in the
17 liability column on the right side.

18 A Yes.

19 Q It says, for Burley Broadcasters, 296 thousand. Is
20 that correct?

21 A Yes.

22 Q \$296,000. And is that the outstanding loan that
23 Burley Broadcasters has with Green County Bank?

24 A The loan it had. It's not that much now that's not
25 the --

1 Q Right. Yeah. Well that's -- sure, certainly this
2 is 1991. But that is what that item refers to.

3 A Yes.

4 Q And that appears on your financial statement because
5 of you're guarantor of that loan. Is that correct?

6 A Right. Correct.

7 Q Okay. In -- referring you to item eight on the
8 assets side, you have an amount, \$500 and \$4,500 for stocks
9 and securities. Is that correct?

10 A Yes.

11 Q Okay. And those are listed as assets that you have?

12 A Right.

13 Q Referring over to schedule four on the second page,
14 the present market value -- you list the present market value
15 for three hundred shares of Burley Broadcasters at \$500,000.
16 Is that correct?

17 A Yes.

18 Q Okay. And, it indicates that those shares are
19 pledged to the Green County Bank.

20 A Yes.

21 Q Now, the three hundred shares that you held in
22 Burley Broadcasters, do you still own three hundred shares
23 today?

24 A I do.

25 Q And have you continuously owned three hundred since

1 the date of this statement to the present?

2 A Yes. Yes.

3 Q Now, with respect to the present marked to be placed
4 on those shares of stock, you did not have any appraisal done
5 on that stock, is that correct?

6 A Correct.

7 Q And you didn't talk to anyone -- any third party
8 regarding valuation or in determining that valuation. Is that
9 correct?

10 A Not really, no.

11 Q And so, it's something you two came up with on your
12 own --

13 A Based on my experience and with other stations I've
14 been involved with, yes.

15 Q Okay. Does Burley Broadcasters own any assets other
16 than WSMB?

17 A No.

18 Q SMG, I'm sorry. Okay. So, WSMG radio station is
19 the -- are all the only assets of Burley?

20 A If you're referring to equipment or are you talking
21 about something else?

22 Q Okay. I'm referring to the radio station and the
23 assets that the radio station utilizes.

24 A That's all Burley Broadcasters' owns, yes.

25 Q And the building where Burley Broadcasters